

J. KENDRICK KRESSE (CA BAR NO. 53926)
JENNIFER PESEK (CA BAR NO. 219161)
CALIFORNIA CENTER FOR LAW AND THE DEAF
14895 E. 14th Street, Suite 220
San Leandro, CA 94578
Tel.: (510) 483-0922 V/TTY
Fax: (510) 483-0967
Email: ken.kresse@deaflaw.org

SHAWNA L. PARKS (CA BAR NO. 208301)
DISABILITY RIGHTS LEGAL CENTER
(formerly Western Law Center for Disability Rights)
919 Albany Street
Los Angeles, CA 90015
Tel.: (213) 736-1031
Fax: (213) 736-1428
Email: shawna.parks@lls.edu

PATRICIA S. MAR (CA BAR NO. 45593)
YOSHIKO INOUE (CA BAR NO. 203642)
RITA F. LIN (CA BAR NO. 236220)
MORRISON & FOERSTER, LLP
425 Market Street
San Francisco, CA 94105-2482
Tel.: (415) 268-7000
Fax: (415) 268-7522
Email: pmar@mofo.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VICTORIA MUNOZ, *et al.*,

Plaintiffs,

v.

SACRAMENTO AREA COUNCIL OF
GOVERNMENTS, *et al.*,

Defendants.

Case No. C 05-01525 (JSW) (EDL)

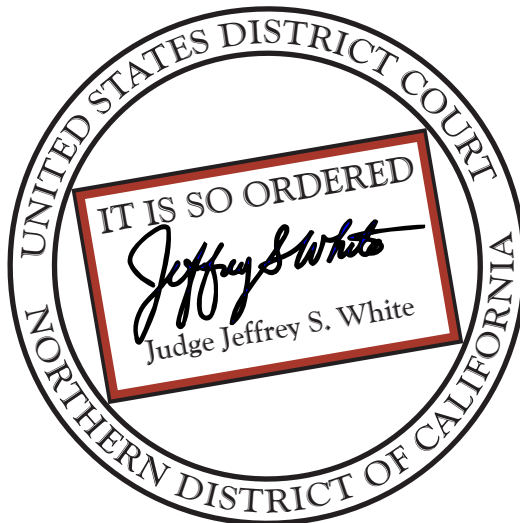
**JOINT STATUS REPORT
REGARDING SETTLEMENT
NEGOTIATIONS AND MOTION
FOR CLASS CERTIFICATION;
REQUEST FOR FURTHER STATUS
CONFERENCE**

Pursuant to this Court's November 22, 2006 order, the parties provide the following status update concerning settlement negotiations.

As of the filing of this report, Plaintiffs have settlement agreements in the process of being executed with defendants Caltrans and CHP. Plaintiffs continue to negotiate the terms of settlement agreements with both defendant Riverside County Transportation Commission (Riverside) and defendant San Bernardino County Service Authority for Freeway Emergencies (San Bernardino). Most, if not all, significant issues that remained in dispute between plaintiffs and these two defendants appear to have been largely resolved late in October. Riverside recently provided Plaintiffs with a new revised draft agreement which was returned with some further revisions to Riverside on December 6, 2006. Counsel for the three parties anticipate a further exchange of drafts with a view toward finalizing the documents within weeks.

Once all settlement agreements have been executed, the parties would then jointly complete preparation and file a stipulated motion for class certification for settlement purposes and for preliminary approval of the settlements.

The parties further request the Court set a status conference on Friday, January 19, 2007 at 1:30 p.m., or a date thereafter convenient to the Court.



Dated: December 12, 2006

1 DATE: December 8, 2006

Respectfully submitted,

2 CALIFORNIA CENTER FOR LAW
3 AND THE DEAF
4 J. Kendrick Kresse
Jennifer Pesek

5 DISABILITY RIGHTS LEGAL CENTER
6 Shawna L. Parks

7 MORRISON & FOERSTER, LLP
8 Patricia S. Mar
9 Yoshiko Inoue
Rita F. Lin

10 By: /s/ Yoshiko Inoue
Attorneys for Plaintiffs

11
12 DATE: December 8, 2006

Joshua Irwin
Deputy Attorney General
California Department of Justice
Office of the Attorney General
Oakland, CA 94612-0550

15 By: /s/ Joshua Irwin
16 Attorney for Defendants California Highway
Patrol and Commissioner Mike Brown

17
18 DATE: December 8, 2006

Jeffrey Benowitz
Department of Transportation, Legal Division
4050 Taylor Street, MS 130
San Diego, CA 92110

21 By: /s/ Jeffrey Benowitz
22 Attorney for Defendants California
Department of Transportation and Director
Will Kempton

23 DATE: December 8, 2006

Jean Basle
Deputy County Government Counsel
385 North Arrowhead Avenue, 4th Floor
San Bernardino, CA 92414-0140

26 By: /s/ Jean Basle
27 Attorney for Defendant San Bernardino SAFE
28

1
2 DATE: December 8, 2006

Marc S. Ehrlich
Best Best & Krieger LLP
5 Park Plz, #1500
Irvine, CA 92614

3
4
5 By: /s/ Marc Ehrlich
6 Attorney for Defendant Riverside
County Transportation Commission

7
8 **RULE 45 ATTESTATION**

9 In accordance with General Order 45, concurrence in the filing of this document has been
10 obtained from each of the other signatories and I shall maintain records to support this
11 concurrence for subsequent production for the court if so ordered or for inspection upon request
12 by a party.

13 By: /s/ Yoshiko Inoue
14 Attorneys for Plaintiffs
15
16
17
18
19
20
21
22
23
24
25
26
27
28